

1 James W. Geriak (State Bar No. 32871)
jgeriak@sheppardmullin.com
2 Steven M. Hanle (State Bar No. 168876)
shanle@sheppardmullin.com
3 SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP
4 650 Town Center Drive, 4th Floor
Costa Mesa, California 92626-1993
5 Telephone: (714) 513-5100
6 Facsimile: (714) 513-5130

7 Robert P. Feldman (State Bar No. 69602)
bobfeldman@quinnemanuel.com
8 Diane M. Doolittle (State Bar No. 142046)
dianedoolittle@quinnemanuel.com
9 QUINN EMANUEL
URQUHART & SULLIVAN LLP
10 555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
11 Telephone: (650) 801-5000
12 Facsimile: (650) 801-5100

13 Attorneys for Plaintiff
ANGIOSCORE, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17
18 ANGIOSCORE, INC.,

19 Plaintiff,

20 v.

21 TRIREME MEDICAL, LLC (f/k/a TRIREME
MEDICAL, INC.), EITAN KONSTANTINO,
22 QUATTRO VASCULAR PTE LTD., and QT
VASCULAR LTD. (f/k/a QT VASCULAR
23 PTE. LTD.),

24 Defendants.

25 AND RELATED COUNTERCLAIMS.
26
27
28

Peter J. Armenio (*Admitted Pro Hac Vice*)
peterarmenio@quinnemanuel.com
QUINN EMANUEL
URQUHART & SULLIVAN LLP
51 Madison Avenue
New York, New York 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Mark Farber (*Admitted Pro Hac Vice*)
mark@farberllc.com
FARBER LLC
4 Corporate Drive, Suite 287
Shelton, Connecticut 06484
Telephone: (203) 258-1305

Case No. 4:12-CV-3393-YGR

**ANGIOSCORE, INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ANGIOSCORE, INC.'S
OPPOSITION TO DEFENDANTS'
MOTION TO AMEND PRETRIAL CASE
SCHEDULE OR IN THE ALTERNATIVE
BIFURCATE PLAINTIFF'S STATE LAW
CLAIMS AND CERTAIN EXHIBITS TO
THE DECLARATION OF RACHEL
HERRICK KASSABIAN IN SUPPORT
THEREOF**

1 Pursuant to Civil Local Rules 7-11 and 79-5 of the Northern District of California, Plaintiff
2 AngioScore, Inc. ("AngioScore"), by and through its counsel, hereby moves to file under seal its
3 Opposition To Defendants' Motion To Amend Pretrial Case Schedule Or In The Alternative
4 Bifurcate Plaintiff's State Law Claims, as well as Exhibits 1 and 4-12 to the Declaration of Rachel
5 Herrick Kassabian ("Kassabian Decl.") filed in support thereof.

6 As stated in the Declaration of Rachel Herrick Kassabian filed concurrently herewith in
7 support of this Administrative Motion:

8 1. Kassabian Decl. Exhibits 1 and 11-12 consist of documents produced in this matter
9 and endorsed "Confidential" by Defendants

10 2. Kassabian Decl. Exhibits 5 and 7-10 consist of documents endorsed "Highly
11 Confidential – Attorneys' Eyes Only" by Defendants.

12 3. Kassabian Decl. Exhibit 4 consists of a document endorsed "Highly Confidential –
13 Attorneys' Eyes Only – Prosecution Bar" by Defendants.

14 4. Kassabian Decl. Exhibit 6 consists of a document designated "Confidential" by
15 third-party Tanhum Feld.

16 5. AngioScore's Opposition to Defendants' Motion To Amend Pretrial Case Schedule
17 Or In The Alternative Bifurcate Plaintiff's State Law Claims contains information obtained from
18 Kassabian Decl. Exhibits 4-12.

19 Because the information contained within Exhibits 1 and 4-12 and within some portions of
20 AngioScore's Opposition to Defendants' Motion To Amend Pretrial Case Schedule Or In The
21 Alternative Bifurcate Plaintiff's State Law Claims was designated as "Confidential" or "Highly
22 Confidential" by Defendants and/or third party Tanhum Feld, AngioScore is not in a position to
23 place these documents in the Court's public record.

24 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of
25 AngioScore's Opposition to Defendants' Motion To Amend Pretrial Case Schedule Or In The
26 Alternative Bifurcate Plaintiff's State Law Claims accompany this Administrative Motion.

27 A proposed order also accompanies this Administrative Motion.
28

1 Dated: September 21, 2014

Respectfully submitted,

2 QUINN EMANUEL URQUHART & SULLIVAN, LLP

3 By: /s/ Rachel Herrick Kassabian

4 Rachel Herrick Kassabian

5 Counsel for Plaintiff
6 ANGIOSCORE, INC.